

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

Slep-Tone Entertainment Corporation
et al.,

Plaintiffs,

v.

Associated Consultants et al.,
Defendants.

**Civil Action No.
1:09cv1390-CMH-JFA**

MOTION FOR LEAVE TO WITHDRAW

Undersigned Attorneys for Plaintiffs, Slep-Tone Entertainment Corporation and Sound Choice Studios, Inc. (hereinafter jointly Plaintiffs), hereby move this Honorable Court for Leave to Withdraw as Attorneys for Plaintiffs based on the following Statement of Fact:

STATEMENT OF FACT

(1). The undersigned, Thomas P. Pavelko, Peter N. Lalos and the Firm of Novak Druce & Quigg LLP (hereinafter jointly Attorneys for Plaintiffs), entered their appearance on behalf of Plaintiffs, at the request of lead counsel James M. Harrington, of Harrington Cipriani LLP (Current Address: Mail: P.O. Box 403 Concord, NC 28026-0403; Street Address: 151 Church Street, N., Concord, NC 28025-4732; email: jharrington@lawhc.com; Tel: 1 (704) 315 5800; Fax: 1 (704)

625 9259) by the filing of a complaint assigned the Civil Action No. above on December 18, 2009;

(2). Mr. Harrington has not entered his appearance *pro haec vice*, but has been listed as “Of Counsel” in the complaint and pleadings;

(3). The Complaint initially named many scores of defendants, and all but six (6) of the defendants have been dismissed from the action;

(4). Of these remaining six (6) defendants, all have been served, but none have Answered or otherwise filed a responsive pleading, and the Clerk has entered a default judgment as to each of these six (6) defendants;

(5). Attorneys for Plaintiffs represented to this Court on September 27th, 2010, “that Plaintiffs intend to move for default judgment in due course...,” but that no motions for default judgment have yet been filed; and,

(5). Mr. Harrington has recently advised the undersigned that he intends to engage other counsel to represent Plaintiffs in the above-captioned case and that Attorneys for Plaintiffs “are discharged”.

SPECIFIC RELIEF REQUESTED

In light of the foregoing statement of fact, and specifically that the undersigned Attorneys for Plaintiffs have been discharged, the undersigned

Attorneys for Plaintiffs move this court for leave to withdraw.

Respectfully submitted this the 6th day of December, 2010.

s/Thomas P. Pavelko/

Thomas P. Pavelko

VA Bar # 019901

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Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of December 2010, I have electronically filed the foregoing document with the Clerk of Court using the CM/ECF system. I certify that the attached document is being mailed on the the 6th day of December, 2010, by U.S. first class mail postage prepaid to the following non-filing users:

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s/Thomas P. Pavelko/
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